

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

TAD MAYFIELD,)	
)	
Plaintiff,)	
)	Case No. 2:21-cv-4059-MDH
)	
v.)	
)	
ELIJAH HAAHR, et al.,)	
)	
)	
Defendants.)	

SECOND JOINTLY PROPOSED STATUS REPORT

COME NOW, Plaintiff and Defendants, by and through their respective attorneys of record, and pursuant to this Court's Order Dated May 10, 2021 (ECF 12), ordering the parties to submit a case status report by December 17, 2021, the parties state to the Court as follows:

1. **Discovery completed:** The parties have exchanged written discovery and both responded to the other party's written discovery. In addition, both parties have produced documents responsive to the other party's Requests for Documents.

2. **Discovery scheduled but not yet completed:** Both Plaintiff and Defendants intend to conduct depositions during the second and third week of January 2022. Plaintiff has requested the depositions of the following persons: (1) Dana Rademan Miller; (2) Emily White; (3) Bryan Scheiderer; (4) Peter Baker; (5) Kenny Ross; and (6) Elijah Haahr. Defendants have requested to depose the Plaintiff.

3. **Discovery at that time identified as necessary but not yet scheduled:** Plaintiff intends to depose Dave Schatz and issue subpoenas for the production of certain communications between Schatz and Peter Baker; certain communications between Kenny Ross, Emily White, and Dana Rademan Miller.

4. **All existing discovery disputes:** Plaintiff and Defendants have exchanged written communications with respective legal authority outlining the propriety of Defendants objecting to certain Interrogatories. Plaintiff intends to confer by telephone with Defendants.

Respectfully submitted,

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